

**MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES**

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

<b>Plaintiffs' Executive Committee for Personal Injury and Death Claims</b>	<b>Plaintiffs' Executive Committee for Commercial Claims</b>
Ronald L. Motley, (1944-2013) Jodi Westbrook Flowers / Donald A. Migliori, <i>Co-Chairs</i> MOTLEY RICE LLC James P. Kreindler, <i>Co-Chair</i> KREINDLER & KREINDLER LLP	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> COZEN O'CONNOR
Andrew J. Maloney III, <i>Co-Liaison Counsel</i> KREINDLER & KREINDLER LLP Robert T. Haefele, <i>Co-Liaison Counsel</i> MOTLEY RICE LLC	J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

**VIA ECF and E-Mail**

April 26, 2022

The Honorable Sarah Netburn  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 430  
New York, NY 10007

RE: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (SN)

Dear Judge Netburn:

Plaintiffs respectfully respond to this Court's Order of April 19, 2022, ECF No. 7885, and inform the Court that they have no objection to the Court's proposal to waive the requirement to file certified copies of the material received from the Metropolitan Police Service (the "MPS Material") in execution of this Court's June 9, 2021 Hague Convention Request to the United Kingdom, ECF 6384-1.

Plaintiffs' counsel already shared the entire collection of MPS Material with the other parties to this MDL, on April 1, 2022. *See* ECF No. 7832, Simpson Decl. at ¶ 13.

Respectfully submitted,

KREINDLER & KREINDLER

MOTLEY RICE

/s/ James Gavin Simpson

James Gavin Simpson, Esquire  
James P. Kreindler, Esquire  
Andrew J. Maloney, Esquire

/s/ Robert T. Haefele

Robert T. Haefele, Esquire  
28 Bridgeside Boulevard  
Mt. Pleasant, SC 29464

Hon. Sarah Netburn

April 26, 2022

Page 2

---

Megan W. Benett, Esquire  
Steven R. Pounian, Esquire  
485 Lexington Avenue, 28<sup>th</sup> Floor  
New York, NY 10017

For the MDL 1570 Plaintiffs' Exec.  
Committee for Personal Injury and Death  
Claims

For the MDL 1570 Plaintiffs' Exec.  
Committee for Personal Injury and Death  
Claims

COZEN O'CONNOR

/s/ Sean P. Carter

Sean P. Carter, Esquire  
1650 Market Street, Suite 2800  
Philadelphia, PA 19103

For the MDL 1570 Plaintiffs' Exec.  
Committee for Commercial Claims

cc: Hon. George B. Daniels via ECF/CM  
All counsel via ECF/CM